

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
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<i>Local Counsel for the Plan Administrator</i>	
In re: BLOCKFI INC., <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered under a Confirmed Plan ²) Hearing Date: January 11, 2024 @ 11:00 AM ET Response Deadline: January 4, 2024 @ 4:00 p.m. ET Oral Argument Waived Unless Response Timely Filed

**AMENDED CERTIFICATION OF AMIT CHEELA IN SUPPORT OF
WIND-DOWN DEBTORS' TWELFTH OMNIBUS OBJECTION
TO CLAIMS FILED AGAINST BLOCKFI WALLET LLC (WALLET
ACCOUNT FUNDS ARE NOT PROPERTY OF THE ESTATE AND ARE
AVAILABLE FOR WITHDRAWAL IN FULL)**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

I, Amit Cheela, pursuant to 28 U.S.C. § 1746, declare:

1. My name is Amit Cheela. I am over the age of 21. I am the Chief Financial Officer for the debtors (collectively, “BlockFi” or the “Wind-Down Debtors”) in the above-captioned Chapter 11 Cases. Accordingly, I am in all respects competent to make this certification (the “Certification”).

2. I submit this Certification in support of the *Debtors’ Twelfth Omnibus Objection to Claims Filed against BlockFi Wallet LLC* (the “Objection”).

3. Except as otherwise indicated herein, the facts set forth in this Certification are based upon my personal knowledge, my review of relevant documents, information provided to me by the professionals in this case and/or employees working under my supervision, or my opinion based upon my experience, knowledge, and information concerning the Wind-Down Debtors’ operations. I am authorized to submit this Certification on the Wind-Down Debtors’ behalf. If called upon to testify, I would testify competently to the facts set forth in this Certification.

4. BlockFi Wallet LLC was created to store the Digital Assets for Client Wallet Accounts and therefore has no third-party creditors. Over 12,000 Proofs of Claim were filed against BlockFi Wallet LLC.

5. The substantial number of BlockFi Wallet LLC Proofs of Claim that have been filed in these Chapter 11 Cases is slowing the claims reconciliation process and forcing the Wind-Down Debtors to devote resources and time to review these Proofs of Claim. Expunging these claims from the registry would significantly streamline and speed up the process of individually reconciling the remaining claims asserted against the Wind-Down Debtors, and would not affect the process for allowance and distribution on claims creditors have for funds held in BIA or as

retail loan collateral, even if a creditor included claims for funds they held in a BIA or as retail loan collateral in a filed BlockFi Wallet LLC Proof of Claim.

6. I have read and reviewed the Objection, including the information regarding the Disputed Claims³ set forth on Schedule 1 to the Proposed Order attached thereto, and I am familiar with the information contained in those documents. In consultation with the Wind-Down Debtors' advisors, I have concluded that the Disputed Claims are claims asserted against BlockFi Wallet LLC.

7. Accordingly, to prevent improper recovery against the estates, I believe that the Proposed Order should be granted and that each such Disputed Claims should be disallowed, as detailed on Schedule 1.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 21, 2023

By: /s/ Amit Cheela
Amit Cheela
Chief Financial Officer to the Wind-
Down Debtors

³ Capitalized terms used but not defined in this Certification shall have the meanings set forth in the Objection.